

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**V.**

**RODERICO ALLEN,  
TYLER SNEED,  
KAZYRA ROBERTSON, and  
JAIDAH JONES,**

**Defendants.**

.....

CASE NO. 1:23-cr-37

**JUDGE** Hopkins

## INDICTMENT

**18 U.S.C. § 2**

**18 U.S.C. § 371**

**18 U.S.C. § 922(a)(6)**

**18 U.S.C. § 1001(a)(2)**

**18 U.S.C. § 1028A**

**18 U.S.C. § 1029(a)(2)**

## FORFEITURE ALLEGATIONS

## THE GRAND JURY CHARGES:

## Introduction

1. At times relevant to this Indictment:
  - a. The following businesses were licensed dealers of firearms (also known as federal firearms licensees or “FFLs”) within the meaning of Chapter 44, Title 18, United States Code:
    - i. American Trading LLC, at 3236 W. Galbraith Rd., Cincinnati, Ohio (“American Trading”); and
    - ii. American Trading II LLC, at 3621 Harrison Ave, Cincinnati, OH 45211 (“American Trading II”).
  - b. Guns.com was an FFL based in Minnesota. Guns.com also provided an online marketplace where other FFLs could offer firearms for sale.
  - c. **RODERICO ALLEN** was a resident of the Southern District of Ohio. **ALLEN** had a prior felony conviction that made it illegal for him to purchase or possess a firearm.

2. Federal law requires that a firearm purchase through an FFL occur in the purchaser's state of residence. Therefore, a firearm that an Ohio resident purchases from an out-of-state FFL must be transferred to an FFL in Ohio, where the sale can be finalized. Local FFLs typically charge a nominal fee for this service.

**COUNT 1**  
**(Conspiracy to Commit an Offense Against the United States)**

**The Conspiracy**

3. Paragraphs 1 and 2 of the Indictment are incorporated here.

4. From in or about May 2022 through at least June 2022, in the Southern District of Ohio, the defendants, **RODERICO ALLEN, TYLER SNEED, KAZYRA ROBERTSON, and JAIDAH JONES**, knowingly and intentionally conspired and agreed with each other, and with others known and unknown to the grand jury, to commit an offense against the United States, that is, to knowingly make a false oral and written statement to a licensed dealer of firearms, as that term is defined in Chapter 44, Title 18, United States Code, in connection with the acquisition and attempted acquisition of a firearm, which statement was intended and likely to deceive the said licensed dealer of firearms as to a fact material to the lawfulness of such sale of the said firearm to the defendants under Chapter 44, Title 18, United States Code, in violation of Title 18, United States Code, Section 922(a)(6).

**Manner and Means of the Conspiracy**

5. The manner and means by which the defendants, **RODERICO ALLEN, TYLER SNEED, KAZYRA ROBERTSON, and JAIDAH JONES**, and others known and unknown to the grand jury, sought to accomplish the objectives of the conspiracy included the following:

a. It was part of the conspiracy that a member of the conspiracy would order a firearm or firearms online, from an FFL. Commonly, members of the conspiracy would purchase

the firearms using another individual's credit card information, without that individual's authorization.

b. It was further part of the conspiracy that, when a member of the conspiracy purchased a firearm or firearms, that member would do so in the name of another member of the conspiracy, for delivery to an FFL in the Cincinnati area.

c. It was further part of the conspiracy that a member of the conspiracy would complete the transfer of the firearm(s) at a Cincinnati-area FFL.

d. It was further part of the conspiracy that, in completing the transfer of a firearm or firearms, a member of the conspiracy would falsely represent on a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473 (Firearms Transaction Record) that he or she was the actual buyer of the firearm(s), when in fact he or she was purchasing the firearm(s) for another member of the conspiracy.

6. As a result of the conspiracy, members of the conspiracy succeeded in having at least approximately fourteen firearms shipped to the Southern District of Ohio and succeeded in obtaining at least approximately nine firearms.

#### Overt Acts

7. In furtherance of the conspiracy, and to effect the object thereof, the conspirators performed and caused to be performed the following overt acts, among others:

a. On or about May 20, 2022, **RODERICO ALLEN** ordered a Cline Tactical C-19 8Ball pistol from Guns.com, in the name of "Jadiah Jones," for delivery to American Trading.

b. On or about May 20, 2022, **RODERICO ALLEN** ordered a Black Rain Ordnance Fallout 15 rifle from Guns.com, in the name of "Jadiah Jones," for delivery to American Trading II.

c. On or about May 23, 2022, **RODERICO ALLEN** ordered a Radical Firearms RF-15 rifle from Guns.com, in the name of **TYLER SNEED**, for delivery to American Trading.

d. On or about May 24, 2022, **RODERICO ALLEN** ordered a Smith & Wesson M&P 15 pistol and a Mossberg 590 Shockwave shotgun from Guns.com, in the name of **TYLER SNEED**, for delivery to American Trading.

e. On or about May 25, 2022, **RODERICO ALLEN** ordered a Canik TP9 pistol and a Glock 27 pistol from Guns.com, in the name of **KAZYRA ROBERTSON**, for delivery to American Trading II.

f. On or about May 27, 2022, **RODERICO ALLEN** ordered an FN Five-Seven pistol, a Century Arms Mini Draco pistol, and a Glock 19 pistol from Guns.com, in the name of **KAZYRA ROBERTSON**, for delivery to American Trading.

g. On or about May 27, 2022, **RODERICO ALLEN** ordered two Glock pistols from Guns.com, in the name of “Jadiah Jones,” for delivery to American Trading II.

h. On or about May 27, 2022, **TYLER SNEED** completed the transfer of a Smith & Wesson M&P-5 pistol and a Radical Firearms RF-15 pistol at American Trading.

i. On or about May 27, 2022, **TYLER SNEED** submitted an ATF Form 4473 at American Trading on which he falsely represented that he was the actual transferee/buyer of the Radical Firearms RF-15 pistol and the Smith & Wesson M&P-15 pistol.

j. On or about May 27, 2022, **JAIDAH JONES** wrote to **RODERICO ALLEN**, via text, “where the place at ima try to go b4 the funeral.”

k. On or about May 27, 2022, **RODERICO ALLEN** sent **JAIDAH JONES**, via text, the addresses of American Trading and American Trading II.



l. On or about May 27, 2022, **JAIDAH JONES** completed the transfer of the Black Rain Ordnance Fallout 15 rifle at American Trading II.

m. On or about May 27, 2022, **JAIDAH JONES** submitted an ATF Form 4473 at American Trading II on which she falsely represented that she was the actual transferee/buyer of the Black Rain Ordnance Fallout rifle.

n. On or about May 27, 2022, **JAIDAH JONES** completed the transfer of the Cline Tactical C-19 8Ball pistol at American Trading.

o. On or about May 27, 2022, **JAIDAH JONES** submitted an ATF Form 4473 at American Trading on which she falsely represented that she was the actual transferee/buyer of the Cline Tactical C-19 8Ball pistol.

p. On or about June 1, 2022, **TYLER SNEED** texted **KAZYRA ROBERTSON** the address of American Trading II.

q. On or about June 1, 2022, **KAZYRA ROBERTSON** responded to **TYLER SNEED**, via text, "Ok."

r. On or about June 1, 2022, **TYLER SNEED** sent **KAZYRA ROBERTSON**, via multimedia message, screenshots of pickup notifications for a Glock pistol and a Canik TP9 pistol.

s. On or about June 1, 2022, **KAZYRA ROBERTSON** completed the transfer of a Canik TP9 pistol and a Glock 27 pistol at American Trading II.

t. On or about June 1, 2022, **KAZYRA ROBERTSON** submitted an ATF Form 4473 at American Trading II on which she falsely represented that she was the actual transferee/buyer of the Canik TP9 and the Glock 27 pistol.

u. On or about June 2, 2022, **TYLER SNEED** wrote to **KAZYRA ROBERTSON**, via text, that **RODERICO ALLEN** “said them guns up there u can go grab them just takes pics of the numbers so when u drop them off.”

v. On or about June 2, 2022, **KAZYRA ROBERTSON** asked **TYLER SNEED**, via text, how many firearms she would be picking up, and **SNEED** said three.

w. On or about June 2, 2022, **KAZYRA ROBERTSON** asked **TYLER SNEED**, via text, which firearms she was getting, and **SNEED** responded, “It’s a fn a glock and Draco.”

x. On or about June 2, 2022, **KAZYRA ROBERTSON** went to American Trading and attempted to complete the transfer of three firearms.

y. On or about June 3, 2022, **RODERICO ALLEN** wrote to **KAZYRA ROBERTSON**, via text, that the firearms had arrived, writing, “can you bring them I’ll give you gas.”

z. On or about June 3, 2022, **KAZYRA ROBERTSON** asked **RODERICO ALLEN**, via text, whether “all three” firearms had arrived, and **ALLEN** confirmed that all three firearms had arrived.

aa. On or about June 3, 2022, **RODERICO ALLEN** warned **KAZYRA ROBERTSON**, via text, that the credit card used for the purchase might be rejected and the firearms might be returned to the sender, writing, “Card could come back they a send them back that’s it ion want them to.”

bb. On or about June 3, 2022, **KAZYRA ROBERSON** texted **RODERICO ALLEN** that she was at American Trading.

cc. On or about June 3, 2022, **RODERICO ALLEN** wrote to **KAZYRA ROBERTSON**, via text, “lmk when you can bring that Glock.”

dd. On or about June 3, 2022, **KAZYRA ROBERTSON** went to American Trading and attempted to complete the transfer of a Century Arms Mini Draco pistol, an FN Five-Seven pistol, and a Glock 19 pistol.

ee. On or about June 3, 2022, **KAZYRA ROBERTSON** submitted an ATF Form 4473 at American Trading on which she falsely represented that she was the actual transferee/buyer of the Century Arms Mini Draco pistol, the FN Five-Seven pistol, and the Glock 19 pistol.

ff. On or about June 3, 2022, **JAIDAH JONES** wrote to **RODERICO ALLEN**, via text: "What's the address to that place?"

gg. On or about June 3, 2022, **RODERICO ALLEN** sent **JAIDAH JONES**, via text, the address of American Trading II.

hh. On or about June 3, 2022, **JAIDAH JONES** wrote to **RODERICO ALLEN**, via text, that she was on her way to "that store."

ii. On or about June 3, 2022, **JAIDAH JONES** attempted to complete the transfer of the two Glock pistols at American Trading II.

**In violation of Title 18, United States Code, Section 371.**

**COUNTS 2-7**  
**(False Statement During Purchase of Firearm)**

8. Paragraphs 1 and 2 of the Indictment are incorporated here.

9. On or about the following dates, in the Southern District of Ohio, the defendants listed below, in connection with the acquisition of a firearm from the federal firearms licensee listed below, knowingly made a false and fictitious written statement to the said federal firearms licensee as to a fact material to the lawfulness of such sale of the said firearm to the defendants under Chapter 44 of Title 18, United States Code, in that the defendants did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473, Firearms

Transaction Record, to the effect that that the person listed below was the actual transferee/buyer of the firearm listed on the Form 4473, when in fact, as the defendants then knew, the individual listed below was not the actual transferee/buyer of the firearm:

<b>Count</b>	<b>Date, on or about</b>	<b>Firearm(s)</b>	<b>Defendants</b>	<b>Person Falsely Represented to be Actual transferee/buyer</b>	<b>Federal Firearms Licensee</b>
2	5/27/22	A Radical Firearms RF-15 pistol bearing serial number 2-000803 and a Smith & Wesson M&P-15 pistol bearing serial number TS66592.	RODERICO ALLEN, TYLER SNEED	TYLER SNEED	American Trading
3	5/27/22	A Black Rain Ordnance Fallout 15 rifle bearing serial number BR054260.	RODERICO ALLEN, JAIDAH JONES	JAIDAH JONES	American Trading II
4	5/27/22	A Cline Tactical C-19 8Ball pistol bearing number CT270128.	RODERICO ALLEN, JAIDAH JONES	JAIDAH JONES	American Trading
5	6/1/22	A Glock 27 pistol bearing serial number BAEG778 and a Canik TP9 pistol bearing serial number T6472-22CB14016.	RODERICO ALLEN, TYLER SNEED, KAZYRA ROBERTSON	KAZYRA ROBERTSON	American Trading II
6	6/3/22	A Century Arms Mini Draco pistol bearing serial number 21PF-9279, an FN Five-Seven pistol bearing serial number 386422876, and a Glock 19 pistol bearing serial number AFKF591.	RODERICO ALLEN, TYLER SNEED, KAZYRA ROBERTSON	KAZYRA ROBERTSON	American Trading
7	6/3/22	A Mossberg 590 Shockwave shotgun bearing serial number V0875049 and a Kel-Tec KS7 shotgun bearing serial number QFJ41.	RODERICO ALLEN, TYLER SNEED	TYLER SNEED	American Trading

**In violation of Title 18, United States Code, Sections 922(a)(6), 924(a)(2), and 2.**



**COUNT 8**

**(Using an Unauthorized Access Device)**

10. On or about May 21, 2022, in the Southern District of Ohio, the defendant, **RODERICO ALLEN**, knowingly and with intent to defraud, used an unauthorized access device, to wit: a credit card account number belonging to J.N., and by such conduct obtained items with an aggregate value of \$1,000 or more, said use affecting interstate and foreign commerce, in that the defendant, **RODERICO ALLEN**, purchased a firearm online from an FFL located outside the State of Ohio and caused the said firearm to be delivered to an FFL in the Southern District of Ohio.

**In violation of 18 U.S.C. §§ 1029(a)(2) and 2.**

**COUNT 9**

**(Aggravated Identity Theft)**

11. On or about May 21, 2022, in the Southern District of Ohio, the defendant, **RODERICO ALLEN**, did knowingly possess and use, without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit: Using an Unauthorized Access Device, in violation of 18 U.S.C. § 1029(a)(2), knowing that the means of identification belonged to another actual person, to wit: J.N.

**In violation of 18 U.S.C. §§ 1028A(a)(1) and 2.**

**COUNT 10**

**(False Statement or Representation to an Agency of the United States)**

12. On or about March 29, 2021, in the Southern District of Ohio and elsewhere, the defendant, **JAIDAH JONES**, did willfully and knowingly make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the government of the United States by falsely stating in a Small Business Administration (SBA)

Payment Protection Program (PPP) loan application, in sum and substance, that she was the owner of a shoe store; that the said shoe store was in operation on February 15, 2020; that the said shoe store had approximately \$200,000 in gross income in 2020; and that the information provided in the application for a PPP loan and in all supporting documents and forms was true and accurate in all material respects. These statements and representations were false, because as the defendant, **JAIDAH JONES**, then and there knew, she was not the owner of a shoe store; the said shoe store was not in operation on February 15, 2020; the said shoe store did not have approximately \$200,000 in gross income in 2020; and the information provided in the application for a PPP loan and in all supporting documents and forms was not true and accurate in all material respects. These statements and representations were also material in that the false statements to the SBA caused the SBA to approve the issuance of a \$20,832 PPP loan to **JAIDAH JONES**.

**In violation of Title 18, United States Code, Sections 1001(a)(2) and 2.**

**FORFEITURE ALLEGATION 1**

Upon conviction of any offense set forth in Counts 1 through 7 of this Indictment, the defendants, **RODERICO ALLEN**, **TYLER SNEED**, **KAZYRA ROBERTSON**, and **JAIDAH JONES**, shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in or used in the commission of such violation(s).

**FORFEITURE ALLEGATION 2**

Upon conviction of the offense set forth in Count 8 of this Indictment, the defendant, **RODERICO ALLEN**, shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(2)(B), any property constituting, or derived from, proceeds obtained directly or indirectly, as a result of such violation; and pursuant to 18 U.S.C. § 1029(c)(1)(C), any personal property used or intended

to be used to commit the offense including, but not limited to, a sum of money equal to the amount of proceeds the defendant obtained as a result of the offense.

**SUBSTITUTE ASSETS**

If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1), 18 U.S.C. § 1029(c)(2), and 28 U.S.C. § 2461(c), to seek forfeiture of any other property of the defendants, up to the value of the property described above.

**A TRUE BILL.**

  
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**GRAND JURY FOREPERSON**

**KENNETH L. PARKER  
UNITED STATES ATTORNEY**

  
**JULIE D. GARCIA  
ASSISTANT UNITED STATES ATTORNEY**